



Greenwood Law Group, PLLC

Emma M. Greenwood, ESQ

February 6, 2019

VIA ECF

Honorable Paul A. Engelmayer
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: U.S. v. Jamel Jones, et al., 1:18-cr-00834-PAE
Status Letter of the Coordinating Discovery Attorney (CDA)

Dear Judge Engelmayer:

Per my appointment in this matter, I respectfully provide the Court with this brief status letter in anticipation of the February 7, 2019 status conference and in light of my absence for at least a portion of said conference. As I have informed the Court and all parties involved, I am unable to promptly attend the conference in this matter as I was previously scheduled to appear at the same time before The Honorable Laura Taylor Swain for a status conference in *U.S. v. Fertides, et al.*, 18 Cr 00319 (LTS), another multi-defendant matter in this District to which I am also appointed CDA. With the Court's permission, I will join the status conference in the present matter upon the completion of the *Fertides* conference. I again appreciate the Court's and the parties' understanding of my scheduling conflict.

Global discovery produced to-date is voluminous and amounts to approximately 620 GB of discovery. There have been ten (10) global discovery productions as of the date of this letter. Per the superseding indictment (S6) filed on ECF on January 31, 2019, three (3) additional defendants have been added to this matter. Accordingly, my staff and I have been preparing administratively. I have reached out to the two newly assigned defense counsel to alert them to my appointment and role in this matter.¹ My office has prepared consolidated copies of global discovery received to-date. These consolidated sets of global discovery, which include productions disclosed by the Government as recently as January 29, 2019 and February 5, 2019, will be promptly distributed upon each counsel's Notice of Appearance in this matter (per the Protective Order's instruction as to whom I may disclose discovery) and confirmation from the Government that each has signed the Protective Order. Additionally, retained counsel may need to coordinate payment to my office for hardware, duplication, and associated costs that are not covered by Court funds. All of these details, and my availability to answer any questions or concerns, have been relayed to newly assigned counsel.

We have also anticipated and accommodated, to the extent possible, the newly indicted in-custody defendants' review of global materials. As Your Honor may recall, my office has provided the Government with a total of eleven (11) 1TB hard drives to make copies of global discovery for the jails; this includes additional drives provided in coordination with the U.S. Attorney's Office in light of access issues recently discussed. Tomorrow, my office will be providing one additional hard drive to the Government to accommodate the newly added defendants, and we will work with the Government to provide additional drives as necessary.

My staff and I remain available to assist the parties in the event any global discovery issues arise.

¹ I understand that defendant Kintea McKenzie has not yet been assigned counsel. It is also my understanding as of this writing that Mr. Cohen, currently appointed CJA counsel for defendant Denard Butler, may be relieved and replaced by new CJA counsel.



Respectfully Yours,

Emma M. Greenwood
Coordinating Discovery Attorney

Cc: All Defense Counsel (via ECF)
AUSA Michael Longyear (via ECF)
AUSA Jacob Warren (via ECF)